

# **Exhibit B**

# PUBLIC INTEREST — LEGAL FOUNDATION —

July 8, 2019

**VIA FAX 313-224-1466  
AND CERTIFIED MAIL**

Ms. Janice M. Winfrey  
Detroit City Clerk  
Chairwoman, Detroit Election Commission  
2 Woodward Ave., Ste. 200  
Detroit, MI 48226

**Re: NVRA Violation and Inspection Visit**

Dear Ms. Winfrey:

On May 23, 2019, we notified you and the Michigan Secretary of State that your office is not in compliance with the list maintenance requirements of Section 8 of the National Voter Registration Act of 1993 (“NVRA”) and certain Michigan laws (attached).

Our letter explained that the City of Detroit has persistently maintained registration lists that include more registrants than adult citizens of voting age. We outlined specific areas where your list maintenance programs and activities are deficient and offered to meet with you to discuss how to remedy those ongoing problems. We also asked to inspect records concerning your list maintenance activities pursuant to the NVRA’s public inspection rights. 52 U.S.C. § 20507(i). **We have not received any response from your office.**

Action must be taken immediately to ensure that Detroit’s registration lists are current and accurate for elections in 2019, 2020 and beyond. Our representatives plan to visit your office on **July 30, 2019**. During our visit, we intend to review and make copies of records we have asked to inspect, present our findings concerning Detroit’s list maintenance activities, and discuss a remedial plan. If you are unavailable on July 30, please provide alternative dates that you are available to meet with us. If we do not hear from you, we will assume July 30 is acceptable.

The City of Detroit is engaged in ongoing violations of the NVRA and Michigan law. As the City’s chief election official, you are responsible for ensuring that the City complies with the NVRA and state law. We prefer to resolve this matter without court intervention. However, if the violations described in our May 23 notice letter are not corrected within 90 days of its receipt, we will pursue legal remedies in federal court, as authorized by the NVRA. 52 U.S.C. § 20510(b)(2).

Should you need to contact us regarding this matter, please contact me at [lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org).

Thank you for your service on this matter.

Sincerely,



Logan Churchwell  
Communications & Research Director  
Public Interest Legal Foundation  
[lchurchwell@publicinterestlegal.org](mailto:lchurchwell@publicinterestlegal.org)

cc:

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